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Massachusetts Independent Certification Inc. – Baystate Organic Certifiers

Creating an Organic Experts Program

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CREATING AN ORGANICS EXPERTS PROGRAM

The goals of this document are:

- To provide guidance and a suggested process for accredited organic certifying agencies who want to teach external educational-agricultural organizations how to implement an Organic Experts Program
- To provide guidance to educational-agricultural organizations who want to build an Organic Experts program

What is an Organic Expert?

An organic expert serves as a consultant to farms and businesses that are seeking organic certification. The expert primarily assists the farmer or business to write the required Organic System Plan (OSP), but may also assist in completing the required paperwork and answer questions as they arise.

Who developed the Organic Experts program?

One of the principles of the NOP's Sound and Sensible program is to make organic certification accessible, affordable, and attainable. As part of this program, Baystate Organic Certifiers (BOC) and the Northeast Organic Farming Association of Massachusetts (NOFA/Mass) partnered to design and establish a pilot program for creating an Organic Experts program. This program would serve as a resource for farmers and business owners to help them write the required organic system plan, and answer their questions during the certification process.

The goals of the pilot program were to:

- Develop methods to train the prospective organic experts from a "learn by doing" perspective
- Have the organic experts assist real farmers and business owners write their organic system plans and walk them through the steps of certification (learning by doing)
- Learn what obstacles and strengths the current certification process possessed
- Share the lessons learned with others seeking to develop an Organic Experts program via a guide or "roadmap." This roadmap would allow certifying agencies to train external organic organizations to write organic system plans
- Prove that direct assistance to farmers and businesses through an independent Organic Experts program would benefit and be less cumbersome to those seeking certification.

Why is an Organic Experts program needed?

In the overall certification world, small-scale farms and businesses are underrepresented and some of these operations do not pursue organic certification due to technical, educational, and time barriers that prevent them from completing an organic system plan. Lack of education

preventing certification is a significant problem. A farmer might be a good farmer and a business owner might bring a great organic product to market, but they have to learn the certification process and acquiring that knowledge is a barrier to certification. Without hiring a consultant, there is little to no technical assistance available to aid them in completing an organic system plan. These farms and businesses are left on their own to complete the organic system plan and many choose not to because they view the task and related process as overwhelming and burdensome.

A Closer Look: Baystate Organic Certifier's (BOC) on the need for an Organic Experts program

In our opinion, the organic certification program is missing an essential element. Organic certification has an accredited certification body that administers the program – the NOP. It has accredited bodies that certify farms and businesses, and farms and businesses that want to be certified. But, what it lacks is a mechanism for teaching farms and businesses how to *achieve* certification. It's possible that when the program was designed, it was thought that the "market" would solve this problem, but the problem remains.

In the thirteen years BOC has been certifying to the National Organic Program standards, we have consistently offered workshops and seminars in our outreach efforts to farms and businesses that need organic certification. Typically we do at least one workshop a year on the certification process and how to get certified. Many years we have done multiple workshops in multiple states. Our outreach efforts have been successful to a degree, but reveal substantial areas of opportunity to increase the number of certified operations primarily because the workshop participants lack basic and accurate information about the organic certification process. In addition, for every workshop participant, there are ten more interested farmers or entrepreneurs who call us about certification rather than waiting to go to a workshop. We have no way of knowing how many other farmers or entrepreneurs are not coming to the workshops or calling us for information that might benefit from our services.

A conflict of interest and unintended consequences

BOC's ability to help prospective clients that call us or come to our workshops is strictly limited to providing farmers and businesses general information as described in NOP Instruction 2614 on Technical Assistance.

We are prohibited from consulting with farmers and businesses regarding organic certification because of Section 205.501(a) of the organic standards which states:

(a) A private or governmental entity accredited as a certifying agent under this subpart must...

(11) Prevent conflicts of interest by...

(iv) Not giving advice or providing consultancy services, to certification applicants or certified operations, for overcoming identified barriers to certification

The unintended consequence of this very sensible conflict of interest clause in the standards is that it prevents the organizations that have the greatest knowledge of the organic certification process and organic system plans from transmitting that knowledge to anyone interested in

getting certified. In essence, this simple clause means that the best information on how to get organically certified is trapped with the experts who work for accredited certifying agencies.

From a client acquisition standpoint this is an ineffective way to deal with clients for both BOC and the NOP. Our own internal statistics show that only a small percentage of the clients who call us or attend our workshops ever get certified. When we make contact with a potential client, what we would really like to do is tell them that we are so excited to work with them that we can be onsite in an hour. We would then walk the farm or business, identify all of the barriers to getting certified, and leave the farmer or business owner with a to do list for creating their organic system plan. That is a client acquisition strategy! Obviously we can't do that, but this example shows the weakness of a client acquisition strategy based on a regulatory body being the sole available expert on the regulatory requirements.

Absent a site visit from a BOC staff member, few small farms and businesses have the skill set to produce and implement an organic system plan when they first contemplate growing organic crops or selling organic products. They have to acquire that skill set on their own, usually as they wade through the organic system plan forms. Many give up when either confronted with the forms for the first time with no help in sight, or when they are unable to complete the forms. Many of them stop the process because they hit a barrier that they can't address on their own. We don't know how many fail to complete the organic certification process because the paperwork is too burdensome or they simply give up. BOC does track new client contacts, and from our interactions with some of these potential clients we know or suspect that a significant number dropped the idea of being certified because they were unable to complete the paperwork.

Organic Experts programs can serve as independent sources of technical support that can aid businesses and farms in completing organic system plans. Grass roots non-profit farming organizations like NOFA/Mass have an educational mission and are ideally suited to help farmers and businesses attain certification once they are trained to be experts in organic system plans. Once trained, these groups would own and run their own outreach programs. They would charge farmers and businesses to write their organic system plans and could create a fee structure that works for all income levels of applicants. Having a number of these groups working throughout the country would make organic certification attainable for all sizes and types of organic farms and businesses.

Additional Benefits of an Organic Experts Program for Certifying Agencies

Farms and businesses lacking proper knowledge regarding the certification process is a significant problem for the certifying agency that must process applications for organic certifications. Poorly written system plans and poorly completed applications for certification slow down the certification process, delay onsite inspections, and in extreme cases, can cause applicants to be denied certification. When an Organic Expert works with applicants for organic certification, the applications are generally of higher quality. This reduces the time necessary to process the application.

What about Technical Service Providers working with NRCS, aren't those organic experts?

It is true that NRCS created a Technical Service Provider program, which does help some farmers, however it has not alleviated the need for additional organic experts. Even if the NRCS program reached all the farms that needed information, it does not work with handlers, and handlers need outreach and assistance as much as the farmers do in creating organic system plans.

Who can form an Organic Experts program?

In principle, anyone qualified and trained to create an organic system plan could be an organic expert. It is up to the certifying agent that is creating an Organic Experts program to identify a partner that they want to work with. Partner organizations must have expertise in either organic agriculture or organic processing or an ability to acquire that expertise. We feel that the best candidates for forming an Organic Expert program are independent education-focused organic agriculture organizations. They have the expertise needed within the organization to act as organic experts and they typically have a mission that supports the establishment of such a program. However, these types of organizations are not the only candidates for creating Organic Expert programs. Just as there are a wide variety of types of certifying agents – private, public, state, and not for profit businesses, there should be a wide variety of Organic Experts programs.

Why would an organization want to form an Organic Experts program?

The existence of an Organic Experts program provides obvious benefits for farms, businesses and certifying agencies. But how does the agricultural-educational partner organization benefit from running the program?

1. They can get paid for their service. Some farms and businesses seeking help through the organic certification process are willing to pay for that help
2. It may be part of the organization's mission to help and support start up farms and businesses succeed
3. The organization can build relationships with farms and businesses that may be unfamiliar with their organization and their other programs.

Can farms and businesses be required to use an organic expert to complete their application for organic certification?

No. A farm or business cannot be required to use an organic expert to complete their organic system plan.

SPECIFIC STEPS FOR FORMING AN ORGANIC EXPERTS PROGRAM

Note: Throughout this document there are references to the *pilot* Organic Experts Program, as operated by Baystate Organic Certifiers and NOFA/Mass. Detailed perspectives from the pilot program are included below and marked in grey. To read the full analysis of the pilot program, refer to the ***Organic Experts Project Analysis and Training Program Summary***.

1. Determine the Demand

The first step in creating an Organic Experts program is to determine if there is a demand for the program. Are farms and businesses looking for help to complete the certification process? Are there resources in the area that are already available to help develop and implement organic system plans? Are resources available for both handlers and farmers? The amount of help already available varies from region to region. Some areas will not need help, but other areas or groups, are currently underserved.

Pilot Program Perspective

We have found nothing but demand for this type of program. Our pilot program was geographically confined to the state of Massachusetts. During the last six months we could have rolled out a similar program in 3-6 other states where applicant farms or handlers needed assistance in completing their organic system plan. In our geographical area there is a need for outreach to handlers, co-packers, and other processing operations, as very few resources exist to assist organic handlers complete their organic system plans.

2. Identify and Choose a Partner

An Organic Experts program can be created by a certifying agent that finds a partner that wants to run a program, or conversely, an organization that wants to run an Organic Experts program can reach out to a certifying agency. Technically an Organic Experts program could be formed without the assistance of a certifying agent, however it is difficult to obtain the technical experience necessary to run an Organic Experts program without a certifying agent providing the necessary training.

3. Consider How The Program and Partnership Will Operate

For organizations considering the creation of an Organic Experts program, there are some basic questions that need to be answered:

- How will the program be funded?
- Does the partner organization have staff or volunteers that could be trained as Organic Experts?
- How will the partnership be structured?
- How will the program be marketed?
- How much time will organic experts have per week to work with applicants?

In addition, one key issue that needs to be resolved is the independence of the Organic Experts Program from the certifying agency. The certifying agency needs to make sure that the Organic Experts are not affiliated with the certifying agency in any way that violates Section

205.501(a)(11)(iv) of the organic standards, as a violation of this section of the standards could imperil the accreditation of the certifying agent.

4. Review the Terms of Agreement Between the Partners

There are some basic terms of agreement that should be agreed to by both parties.

The accredited certifying agent is committing to support the Organic Expert program by providing training of organic experts as needed. The certifying agent should also commit to marketing the program and notifying potential applicants that organic experts are available to help with creating organic system plans. At minimum, the Organic Experts program should be introduced as a resource for farms and business at outreach events such as seminars and workshops, and notice of the program should be listed on the certifying agent's website.

The partner organization is committing to run an Organic Expert program for a specified period of time. The partner organization is committing to have one or more experts complete the training provided by the certifying agency, and to work a specified number of hours per week creating organic system plans. Successful Organic Expert programs will develop their own marketing programs and outreach to prospective clients.

It is recommended that the partners set up a pilot program first or at least decide to review the success or failure of the program at set periods of time.

In addition to the above terms, both parties should also consider the following key areas:

Scope of Operation

Any agreement between a certifying agent and a partner organization should detail the scope of the operation on several levels. The partners should discuss whether the certifying agency plans to train other organic experts; whether the partner organization will have exclusivity in a geographical area; and what certification scopes (crop, wild crop, livestock, and handling) the partner organization will work with.

The partners should also discuss the range of services provided to farms and businesses. For example, some operations need organic system plans created from scratch, some need site visits, some need a final review of their organic system plans, some simply have questions, and some need help developing a recordkeeping system that is compliant with the standards. Partners should understand the variety of needs that face the farmers and businesses, and be ready to provide a range of services.

Fees

As part of maintaining the independence of the Organic Expert program it is suggested that the partner organization determine any and all fees for its services. Even though there may be a large demand for the services of an Organic Expert not every farm or business will want to or be able to pay for help completing their organic system plan. Some flexibility in payment options is preferred.

Confidentiality

The organic standards require that the certifying agent keep confidential any business information provided by a farm or business applying for organic certification. If a farm or business is working with an organic expert, the certifying agent cannot talk about the information in the applicant's organic system plan without the permission of the farm or business. It is recommended that certifying agents developing an Organic Experts program have a form or mechanism for farms and businesses to sign which would allow the certifying agent to discuss the applicant's organic system plan with the organic expert.

Organization of the Pilot Program

The pilot program run by BOC and NOFA/Mass was confined to the state of Massachusetts. Though the pilot program was open to both farms and processors, it primarily focused on organic system plans for farms, or on farm handling. NOFA/Mass was approached by BOC to run the Organic Experts program because NOFA/Mass has an educational focus, does outreach to organic farms, and has no corporate or structural overlap with BOC. Both operations have a long history of working together. BOC was formed out of the NOFA/Mass Organic Certification program in the early 2000s so there is shared history between the two organizations.

BOC trained two organic experts that were NOFA/Mass employees. NOFA/Mass agreed to market the program and to do at least three organic systems plans as part of the pilot program. There were no fees assessed to farms or processors that participated in the pilot program. Baystate agreed to provide follow-up training as needed and feedback on the organic system plans created as part of the pilot project.

5. Identify the Right Trainees

Identifying the right person to be an organic expert can be a challenge for the partner organizations creating an Experts Program. The ideal candidate will have the following qualifications:

- A background in either farming or food processing
- Ease and experience with paperwork
- Some experience with organic certification or the organic standards
- Innate curiosity about organic farming and food production
- A desire to help farms and businesses achieve certification.

Of all of these qualifications, experience with organic certification and completing the forms required for organic certification is the most important. Someone who does not have this experience can be trained to be an organic expert but it is easier to train someone who already has experience with the process and the required forms.

Pilot Program Perspective

The candidates that we trained as part of the pilot program had experience as either as a certified organic farmer or a transitional organic farmer. The fact that one of them had certified their own farm made the training easier. Both trainees were interested in working with farms and businesses to help them achieve certification.

6. Develop the Training Curriculum

The accredited organic certifying agency leads the trainings. A basic outline for training is as follows:

- Organic Standards review
- Organic system plans & application forms - basic training
- Address common objections to organic certification – cost, recordkeeping
- Create mock system plans
- Feedback on mock system plans
- Create an organic system plan for a real operation
- Feedback on organic system plans

The above is only a suggested outline, certifying agents will want to set up their own training structure.

Pilot Program Perspective

Below is the training plan we followed for the Pilot Project in more detail. It took about forty hours to train the Experts. Training was delivered via multiple training sessions over the course of several months.

- Trainees are introduced to the organic standards, the requirements for certification, and the components of a compliant organic system plan
- Trainees compose an organic system plan for a mock farm or business
- Trainer shares all forms, links and documentation required for each certification category, state guidelines, and the National Organic Program's standards
- Trainees must complete all of the certification agency's certification forms based on their mock farm and communicate all questions and obstacles to the trainer
- Trainees must write an Organic System Plan (OSP) and submit in sections to the trainer for review
- Trainers give feedback and advise how the agency might respond to the OSP
- Trainees also provide insight to errors or areas of needed clarification to the trainer, and discussion is encouraged of each aspect of certification.

In our training we chose to focus on having the trainees create compliant organic system plans and fill out application forms themselves, rather than classroom study of the organic standards. We then offered feedback to the trainees on what they had completed. Naturally, questions arose about the requirements of the standards, which led to training on those particular standards.

Focusing on system plans and the forms for certification also allowed us to share insight on how we would review the system plan and ultimately inspect the applicant operation to the system plan. If an Expert understands the certification process, then they can prepare the farm or business for the process of certification.

The following key areas should be covered during training:

Scopes – Crop, Wild Crop, Livestock, and Handling

There are four scopes for organic certification. Farms and businesses may be certified to one or more scopes. Partners don't need to be trained on all scopes. For example, we did not train the Experts in the pilot program on Wild Crops since there are not many operations certified to this scope in our area. For some certifying agents, having a partner that worked with dairies and did only livestock system plans might be appropriate. Similarly, it seems that Experts trained only to work with handlers, or Experts only trained to work with crops and livestock may be desirable as there is not much overlap between organizations that work with farms, and organizations that work with handlers and producers of processed products.

Exemptions and Exclusions

One of the key areas that should be part of the training is what operations are exempt from being certified as organic and what operations are excluded from being certified as organic. Of particular importance is the exemption for operations that have gross sales of organic products totaling less than \$5,000 annually. It is important that the Expert understand what rights and responsibilities these operations have, especially if they are working with a lot of startup businesses that may be exempt.

Organic Cost Share Reimbursement

Another key area for training is the organic cost share reimbursement program. Even though this program has been around for a long time, there are still many farms and businesses that are not aware it exists, how it works, or the amount of potential reimbursement that is available. The cost of certification is a common reason small scale and startup operations cite as a reason to forego organic certification. Understanding the reimbursement and the true out of pocket cost of certification is something that it is important for the Expert to understand.

Pilot Program Perspective: Certificates of Completion

We did not provide certificates of completion to the Experts that completed our training program but we feel that it would be a good idea to do so going forward.

7. Market the New Program

Both the certifying agent and the partner organization have to take responsibility for marketing the program and ensuring farms and businesses know the scope of services being offered.

In the pilot project, NOFA/Mass took responsibility for marketing the program and marketed the program through their own in house publications and website. An outline of their marketing plan is included here but a complete description is in our Project Analysis document.

Outline for Marketing Plan

- Develop publications designed to describe the Organic Experts program for outreach to farmers and businesses seeking certification. Publications may include:
 - Brochures
 - Flyers
 - Website content
 - Press releases

Specifically in the publications designed for farmers and businesses seeking certification, key messages should be included that address the common barriers to certification such as:

- Organic certification is not expensive
 - Organic certification gives customers confidence in a new farmer
 - OSP Expert help is available to walk you through the process
 - Record keeping for organic certification makes good business sense
- Announcement of the Organic Experts program to general public, farmers and businesses seeking certification, and agricultural organizations. Announcement methods may include:
 - Attendance and public speaking at agricultural events and conferences
 - Creation of a website or webpage
 - Utilization of social media to spread awareness
 - Notices in agricultural publications and newsletters

A sample brochure for marketing this type of program is also attached.

8. Provide Post-Training Support and Resources

It is important that the certifying agent support the Experts Program. Suggested post training activities include:

- Developing a system for Experts to get their questions answered about the requirements of the standards and aspects of the organic system plans.
- Giving feedback to the Organic Expert on the organic system plans they create. Note that this requires the permission of the farmer or business applying for organic certification.
- Feedback given to Organic Experts from the certifying agency partner should be recorded and common questions and issues should be addressed in future trainings, and utilized to create additional training and informational documents. The certifying agency could create training materials that include:

- Basic certifications concepts, explained in easy to understand language
- FAQ's
- Checklists
- List of resources

Just as the organic experts in training would benefit from the creation of easy to understand training documents, the farmer would also benefit. The availability of these documents online and in print form will result in a more manageable application process for farmers and would reduce perceived barriers to certification.

Pilot Program Perspective: creating "how to" documents and additional technical resources

We believe the creation of easy to understand informational documents is critical to the future success of both the Organic Experts program and the certification efforts of the farmer. During the creation of the Experts Program we realized that new applicants for organic certification, or operations that were exploring organic certification had a lot of technical questions about the organic standards. These questions are asked regularly during our workshops and during phone conferences with potential applicants. We felt that having documents available on our website to answer common questions about organic certification would be a helpful resource for the Experts and for applicants for certification who did not need to use an Expert but needed to get a specific question answered. There are literally hundreds of questions that could be posed and answered in these documents. We created ten as part of this project. The documents we created may be used by any agency or organization.

We believe that it is important to have additional technical resources to both applicants and experts because there is a lack of educational materials available to farms and businesses contemplating organic certification. The form and manner of additional technical assistance should be devised by the individual agency.

9. Structure the Program for Long Term Success

As needed, the certifying agent and the partner organization should meet to discuss whether the program is working for both organizations and what needs to be done to continue the program or make it more successful. Continued funding for the program will probably be an ongoing challenge and should be discussed between the partners.

LESSONS LEARNED FROM THE PILOT PROGRAM

The pilot project was very successful with all eight participants eventually receiving certification. Below we summarize the key lessons learned from our perspective (Baystate Organic Certifiers) and our partner, NOFA/Mass.

The pilot program initially aimed to assist three types of applicants write their organic system plans: a crop operation, a livestock operation, and a handling operation. Eight organic system plans in all were submitted for different farms and businesses that wanted to be certified. For a short term pilot project there was significant unexpected demand.

Common characteristics of participating farmers and businesses included:

- All participants were unsure of how to start the certification process
- All participants lacked an accurate understanding of basic certification concepts and skills such as:
 - Many believed that writing an organic system plan would be similar to writing an elaborate “thesis”
 - Making organic compliant compost was an unknown to participating crop farmers
 - The majority of participants had to add key record keeping steps to their daily work in order to be compliant
 - Calculating dry matter intake was a mystery to livestock farmers
- All farmers except one had started their farming enterprise within the last 3 years
- No participants knew how to use OMRI to review potential amendments and processing products
- All participants were happy to have someone to either help them fill out the forms, review their applications and checklist prior to submission or to discuss acceptable certified organic farming practices.

Lessons Learned

It is our belief that this project showed that creating an organic system plan is a barrier to certification for some farms and businesses contemplating organic certification and having an organic expert available to assist in writing the organic system plan removes that barrier. In addition, we learned the following lessons from this project:

- There is demand for this type of service. We received eight applications in a limited time for a project of limited scope. It will be interesting to see how many operations would use this service without such time limitations.
- The applicants that used the pilot project were unknown to BOC prior to submitting their organic system plans for certification. Though we do a significant amount of outreach, it is obvious to us that there are additional potential applicants we are not reaching.
- In addition to help with system plans, at least in the geographic area of the pilot project, there is a need for additional organic extension and outreach services. The Experts

worked with a lot of farms and operations that had questions about organic farming practices or organic production methodology. It shows that there is a continuing lack of organic educational resources outside of the organic certification process.

- The organic system plans that were produced with the help of an Organic Expert were generally better written and of higher quality than the system plans produced by new applicants with no help from anyone. The sample size of the project was small but the quality difference in the system plans was unmistakable.
- The focus of the pilot project unintentionally became farm certification. Additional work needs to be done to reach start up handlers and other processing operations that need help in the certification process.
- The question of how much farms and businesses would pay for this service remains unanswered, as our partner did not charge for their service. Long term funding of the program will have to be found in order for it to continue.

For further reading about the pilot program, consult the ***Organic Experts Project Analysis and Training Program Summary***.